

Hearing Aid Compatible Telephones
WT Docket No. 01-309
RM-8658

Report Date: November 17, 2005

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WestLink Communications, LLC (“WestLink”) to avail itself of the temporary relief granting HAC status to dual-mode GSM phones through August 1, 2006, as set forth in *Memorandum Opinion and Order*, WT Docket No. 01-309, FCC 05-166, released September 8, 2005 (“GSM Order”).

(1) Digital wireless phones tested: WestLink operates a 1900 MHz GSM system and acquires wireless telephone handsets manufactured by Nokia, Motorola and Sony Ericsson (collectively, “Vendors”). WestLink obtains from Nokia hearing aid compatible (HAC) handsets that are rated M3 under standard ANSI C63.19-2005 (“Compliant Phones”). Models tested include 6230 and 6620.

(2) Laboratory used: WestLink does not conduct the laboratory testing of handset devices for compliance with the ANSI C63.19 standard. WestLink relies upon its Vendors to conduct testing and to confirm the compliance of each specific handset device.

(3) Test results for each phone tested: The Compliant Phones deployed by WestLink have tested positively for M3 compliance.

(4) Identification of compliant phone models and ratings according to ANSI C63.19: Nokia models 6230 and 6620 are rated M3 under standard ANSI C63.19-2005 in the 1900 MHz band.

(5) Status of product labeling: WestLink typically relies upon its Vendors to label all products prior to their shipment to WestLink's retail locations. The Compliant Phones offered by WestLink contain M3 product labeling and additional information. WestLink itself labels a set of four handset models that it presently offers as "hearing aid compatible" by either volume control or special earbud adapters, listing the special compatibility characteristics of each.

(6) Outreach efforts: Compliant Phones are being publicly identified for consumers and audiologists. Compliant phones are listed on WestLink's web site, and the information is being communicated to consumer groups. WestLink trains its retail salespeople regarding which digital wireless phones are compliant. Written materials, pamphlets and other promotional literature are provided at the point of sale, addressing the needs of individuals with hearing disabilities. WestLink conducts a consumer education program aimed at reaching hearing aid and cochlear implant users. Consumers are given a 30-day trial period within which to try out digital wireless phones to determine whether they will work properly with their hearing aids. Flexible return policies apply to consumers seeking to obtain Compliant Phones. Toward this end, WestLink has specifically instructed its sales force to make this policy known to consumers, and to assure that the flexible policy is administered to HAC phone users. Additionally, WestLink conducts outreach activities toward audiologists and hearing aid dispensers who are in a position to inform hearing aid users in advance concerning the immunity of their hearing aids and the degree of likelihood that they will be able to use particular digital wireless phones and services. Current technical and anecdotal information is made available to the public regarding the hearing aid compatibility of WestLink's Compliant Phones in the form of handouts from Nokia that are distributed at retail centers and in all communications with the hearing disabilities community.

(7) Retail availability of compliant phones: Compliant Phones are available in all of WestLink's retail outlets.

(8) Incorporation of hearing aid compatibility features into newer models of digital wireless phones: WestLink is in contact with its Vendors with regard to their incorporation of HAC features into future GSM phones. WestLink is following its Vendors' efforts to provide dual-band GSM handsets that will be hearing aid-compatible in both the 850 MHz band and the 1900 MHz band.

9) Activities related to ANSI C63.19 or other standards work intended to promote compliance with the FCC Order: WestLink is aware that its Vendors are undertaking to comply with the FCC' GSM Order. WestLink is ready and willing to offer additional compliant devices to interested customers, and will encourage its Vendors to expedite the availability of advanced handset devices.

(10) Number of compliant and non-compliant phone models offered at this time:
WestLink's core assortment presently includes 14 models of GSM handsets. Two of these are Compliant Phones.

(11) Differences in handset offerings among regions in service areas, if any:
WestLink's handset offerings are uniform throughout its service area.

(12) Ongoing efforts for interoperability testing with hearing aid devices:
WestLink will rely mainly upon its Vendors to conduct interoperability testing of Compliant Phones, and will provide to consumers information about those efforts upon request.